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14 *Attorneys for Defendant Zuffa, LLC, d/b/a*  
15 *Ultimate Fighting Championship and UFC*

16  
17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch, Brandon  
20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,  
on behalf of themselves and all others similarly  
21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting  
Championship and UFC,

25 Defendant.  
26  
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No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.  
GRIGSBY IN SUPPORT OF ZUFFA,  
LLC'S MOTION TO SEAL  
EXHIBITS AND PROTECTED  
MATERIALS AT THE  
EVIDENTIARY HEARING ON  
CLASS CERTIFICATION**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia and the bar of  
3 the State of New York. I am admitted *pro hac vice* to practice before this Court. I am a Partner in  
4 the law firm Boies Schiller Flexner LLP (“BSF”), counsel for Zuffa, LLC (“Zuffa”) in the above  
5 captioned action in the U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No.  
6 2:15-cv-01045-RFP-PAL.

7 2. I make this declaration in support of Zuffa’s Motion to Seal Exhibits and Protected  
8 Materials at the Evidentiary Hearing on Class Certification. Based on my personal experience,  
9 knowledge, and review of the files, records, and communications in this case, I have personal  
10 knowledge of the facts set forth in this Declaration and, if called to testify, could and would testify  
11 competently to those facts under oath.

12 3. Exhibit A to this declaration is a true and correct copy of the Declaration of Brent K.  
13 Nakamura in support of Zuffa, LLC’s Motion to Seal Exhibits and Protected Materials at the  
14 Evidentiary Hearing on Class Certification.

15 4. Exhibit B to this declaration is a true and correct copy of a declaration signed by  
16 former Zuffa Chief Legal Officer and Executive Vice-President and current Zuffa Chief Business  
17 Officer Wm. Hunter Campbell on June 14, 2019.

18 5. Exhibit C to this declaration is a true and correct copy of the Parties’ combined  
19 exhibit lists with two additional columns that specify whether each exhibit should be sealed,  
20 redacted, or public and the category of information found in the document. In addition, as noted in  
21 the concurrently filed Joint Notice of Third Party Objection Letters Regarding Certain Third Party  
22 Documents Listed in the Parties’ Exhibit Lists, Exhibit C lists exhibits produced by third parties and  
23 indicates which of those exhibits the third parties have stated should be protected from public  
24 disclosure.

1 I declare under penalty of perjury under the laws of the United States of America that the  
2 foregoing facts are true and correct. Executed this 14th day of June, 2019 in Washington, DC.

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4 /s/ Stacey K. Grigsby  
5 Stacey K. Grigsby  
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